



Cabot Corporation  
Two Seaport Lane  
Boston, MA 02210-2019  
United States

**CABOT CORP.'S RESPONSE TO  
FANSTEEL METALS/FRMI SUPERFUND SITE  
INFORMATION REQUEST**

March 31, 2021

**QUESTIONS**

**QUESTION 1. Please provide the full legal name, mailing address, and phone number of the Respondent.**

RESPONSE TO QUESTION 1:

Cabot Corporation  
Two Seaport Lane  
Suite 1400  
Boston, MA 02210  
617-345-0100

**QUESTION 2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.**

RESPONSE TO QUESTION 2:

Gerard A. Caron  
Chief Counsel, SH&E  
Cabot Corp.  
Two Seaport Lane  
Suite 1400  
Boston, MA 02210  
617-342-6080 (phone)  
617-342-6256 (fax)  
[gerry.caron@cabotcorp.com](mailto:gerry.caron@cabotcorp.com)



Timothy Knapp  
Regional Manufacturing Director  
Cabot Corp.  
Two Seaport Lane  
Suite 1400  
Boston, MA 02210  
617-342-6293 (phone)  
617-342-6256 (fax)  
[timothy.knapp@cabotcorp.com](mailto:timothy.knapp@cabotcorp.com)

**QUESTION 3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.**

RESPONSE TO QUESTION 3: See information for Gerard Caron provided in Response to Question 2.

**QUESTION 4. Please explain the business relationship between Respondent and Fansteel Metals.**

RESPONSE TO QUESTION 4: Based upon information and belief, in approximately 1993, Cabot Corp. ("Cabot") purchased an arc furnace from Fansteel Metals and had the furnace shipped to Cabot's former tantalum manufacturing facility in Boyertown, PA. Cabot sold its tantalum business, including the Boyertown site, in 2012.

In addition, based on the documentation EPA provided to Cabot as part of this information request, it appears that Cabot may have had "swap" transactions of tin slag with the Fansteel Metals site in in the 1988 timeframe. See Attachment A. Cabot has no direct knowledge of those alleged transactions.

**QUESTION 5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:**



- a. The type and purpose of the transaction;**
- b. A description of the materials involved, including their quantity and chemical content and characteristics;**
- c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;**
- d. Any amounts paid by or to Respondent in connection with each transaction;**
- e. The date of each transaction;**
- f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;**
- g. The name(s) and address(es) of any entities providing transportation services for such materials;**
- h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and**
- i. if ownership of material changed at any point as a result of the transaction.**

**RESPONSE TO QUESTION 5:**

- a. See Attachment A.**
- b. See Attachment A.**
- c. See Attachment A.**
- d. See Attachment A.**
- e. See Attachment A.**
- f. See Attachment A.**
- g. See Attachment A.**



- h. See Attachment A.
- i. See Attachment A.

**QUESTION 6.** Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:

- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
- b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
- c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
- d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
- e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
- f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
- g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
- h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of



**hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?**

**RESPONSE TO QUESTION 6:**

a. Fansteel Metals was a competitor of Cabot's former tantalum business. Cabot sold that business in 2012.

b. No knowledge.

c. No knowledge.

d. No knowledge.

e. No knowledge.

f. No knowledge.

g. No knowledge.

h. No knowledge.

**If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.**

Cabot sold its tantalum business to Global Advanced Metals in 2012. Very few documents were retained by Cabot regarding this former business.

750  
CABOT

Attachment  
A

February 3, 1988

Donna Gilstrap  
Fansteel Metals  
Number Ten Tantalum Place  
Muskogee, OK 74401

Re: Tantalum/Tin Slag Ore "Swap"

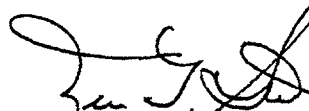
Dear Donna:

Enclosed please find Summary of Tin Slag Shipped, their gross weights, analysis and copies of scale tickets.

The last load (load #12) departed our plant on February 2, 1988.

If you have any questions, please call.

Sincerely,



William L. Sheubrooks  
Shipping Supervisor

WS/11

xc: W. Rasmussen

Cabot Corporation  
County Line Road  
Boyertown, Pennsylvania 19512  
Phone: 215 367-2181

# CABOT

## Summary of Thais Tin Slag:

	<u>Cabot</u>	<u>Marks</u>	<u>Drums</u>	<u>Net Wet lbs</u>	<u>Moisture</u>	<u>Net Dry lbs</u>	<u>Ta2o5 lbs</u>	<u>Cb205 %</u>
2521	2429	592	120	117,743.24	35.32 lbs .03%	117,707.92	17,197.13 14.61%	11.91%
2522	2444	588	120	111,957.22	33.59 .03%	111,923.63	17,392.93 15.54%	12.15%
2523	2515	654	120	110,929.86	33.28 .03%	110,896.58	17,133.52 15.45%	11.73%
2524	2520	661	120	110,784.35	33.24 .03%	110,751.11	16,740.03 15.115%	11.12%

## Summary of Gross Weights Shipped to Fansteel:

<u>Load #</u>	<u>Cabot Lot</u>	<u>Marks</u>	<u>No. Drums</u>	<u>Gross lbs</u>	<u>Remarks</u>
1	2429	592	40	43,620	
2	"	"	40	43,300	
3	"	"	40	43,340	
Total Lot 2429				130,260	
4	2444	588	40	40,820	
5	"	"	40	42,135	Cabot Scale
6	"	"	40	42,880	
Total Lot 2444				125,835	
7	2515	654	40	40,400	
8	"	"	40	40,872	Cabot Scale
9	"	"	40	40,260	
Total Lot 2515				121,532	
10	2520	661	40	41,560	
11	"	"	40	40,214	Cabot Scale
12	"	"	40	41,340	
Total Lot 2520				123,114	

Note: Cabot Scale indicates that each pallet of ore was weigh-out using our dock scale.

# CABOT

## Summary of Analysis: (Percent unless indicated otherwise)

Elements	<u>Lot 2429</u>	<u>Lot 2444</u>	<u>Lot 2515</u>	<u>Lot 2520</u>
Ta2O5	14.61	15.54	15.45	15.115
Cb2O5	11.91	12.15	11.73	11.12
Al	1-10	1-10	1-10	1-10
Ba	.05-.1	.1-.5	.1-.5	.01-.05
B	.01-.05	.01-.05	.01-.05	.01-.05
Ca	1-10	1-10	1-10	1-10
Cr	.1-.5	.1-.5	.1-.5	.1-.5
Hf	.1-.5	.1-.5	.1-.5	.1-.5
Fe	1-10	1-10	1-10	1-10
Mg	.5-1.0	.1-.5	.1-.5	.05-.1
Mn	1-10	1-10	1-10	1-10
Si	1-10	-	1-10	1-10
Na	.1-.5	.1-.5	.5-1.0	.1-.5
Th	.1-.5	.1-.5	.1-.5	.1-.5
Sn	1-10	.5-1.0	.1-.5	.5-1.0
Ti	1-10	1-10	1-10	1-10
W	.1-.5	.1-.5	.1-.5	.1-.5
U	.05-.1	.1-.5	.1-.5	.1-.5
V	.1-.5	.1-.5	.1-.5	.1-.5
Zn	1-10	-	1-10	1-10
P	.39	.16	.41	.54
S	450 ppm	590 ppm	540 ppm	510 ppm
C	785 ppm	-	450 ppm	.13%